

August 17, 2000

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CALFED Bay-Delta Program

**Kings County  
Water District**

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Hanford, CA 93230  
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Mr. Steve Ritchie, Acting Executive Director  
Cal-Fed Bay-Delta Program  
1416 Ninth St., Suite 1155  
Sacramento, CA 95814

Re: Final Programmatic EIS/EIR

Dear Mr. Ritchie:

Please accept the following comments from Kings County Water District. We serve more than 300 family farms in Northeastern Kings County, and represent 143,000 acres of prime farmland growing everything from apricots to zucchini.

**Board of Directors**

Steven P. Dias  
*President*

Michael Murray  
*Vice President*

Barry H. McCutcheon

Joseph Freitas

Ernest A. Taylor

**General Manager**

Don Mills

Groundwater – We strongly believe that groundwater is managed much more efficiently at the local level. Our current plan reinforces the actions we have been taking for over 50 years to balance our intermittent overdraft. United States Congressman Cal Dooley is an example of 3 generations of local administration of sound groundwater programs. His grandfather, Cal Champion, formed the Water Protective League, which later became Kings County Water District. There is an existing spirit of co-operation in our groundwater basin, and I am convinced that additional State or Federal involvement would not help.

CALFED continues to use a false premise. Water conservation efforts in the San Joaquin Valley will not free up water to be marketed or transferred elsewhere. More efficient irrigation results mainly in reduced groundwater pumping since our surface supplies are not adequate to meet all crop demands. Conservation programs will likely reduce the total hours that deep wells run on most farms. They will stretch the surface supply from 60% to 70% of total crop demand and shrink the demand on groundwater from 40% to 30%. This will help our long-term overdraft problem only if the conserved surface water stays in the area. We are a model for conjunctive use, groundwater recharge and storage, and have been for 50 years.

To meet CALFED goals, we all know additional surface storage north and south of the Delta must be built. Groundwater storage is an important component but percolation rates, reservoir size and transportation facilities to recharge areas limit its effectiveness. We cannot catch sporadic flood flows as fast or efficiently in groundwater basins as we can in surface reservoirs. We should know, we've been doing it for over 50 years.

Ground Water Recharge • Water Education • Water Conservation

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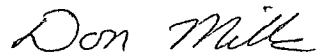
Your Environmental Water Account (EWA) will be in the marketplace south of the Delta buying water at \$100.00 - \$130.000 per acre foot for environmental purposes. You will be in direct competition with Irrigation, Conservation, and Recharge District's like ours. We buy local Valley supplies when available to recharge and balance our overdraft but we can only pay \$20.00 - \$30.00 per acre-foot for recharge water. While you preach groundwater banking as a solution, you will be torpedoing many existing groundwater banking programs in our Valley and expanding our overdraft. If the EWA is allowed to "borrow" water and reservoir capacity, won't this adversely affect the ability of other contractors to manage their water supplies?

You have over estimated the groundwater storage capacity of the eastern San Joaquin Valley, and possibly the Kings River fan. There are so many permanent plantings on the eastern side of the Valley it causes two problems for our recharge efforts. 1) Price of land is extremely high and large parcels seldom become available. 2) Neighboring tree growers object to maximizing recharge in a basin close to their trees. They don't want the local water table high enough to cause root problems in the summer. This effectively takes the top 15 feet of soil out of our storage efforts in many cases.

You have underestimated the local opposition and ordinance regarding groundwater banking and exportation. Is the State ready to override local governments affecting local resources? We have spent generations banking water that CALFED will manage, I think not!

You have no substantive way of addressing the third party impacts for long term out of basin water transfers, and ag land retirement programs. Our local small communities will suffer.

Sincerely,



Don Mills  
General Manager

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